

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE LUIS MULERO COLON

DEBTOR

CASE NO. 13-06917/ESL

CHAPTER 13

DEBTOR'S REPLY TO MOTION TO DISMISS, DOCKET #33

TO THE HONORABLE COURT:

COMES NOW, JOSE LUIS MULERO COLON, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On July 5, 2017, Money Express filed a motion to dismiss, docket #33, basically alleging that the debtor has defaulted in his Plan payments in the sum of \$200.00.
2. The debtor met with the undersigned attorney regarding this matter and respectfully submits that he did incur in the Plan arrears due to certain economic problems.
3. The debtor hereby respectfully submits that on July 14, 2017, he made one (1) \$200.00 payment in order to cure the arrears in his Plan payments. Attached is copy of the payment made to the Trustee on July 14, 2017.

WHEREFORE, debtor respectfully requests this Honorable Court deny the motion to dismiss, docket #33, filed by Money Express.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13 Trustee, Alejandro Oliveras Riveras, Esq.; I also certify that a copy of this motion was sent via US Mail to the debtor, Jose Luis Mulero Colón, to the address of record: Villa del Carmen J13 11 Street, Cidra, PR 00739.

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Debtor's Reply Motion to Dismiss
Case no. 13-06917/ESL13

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 17th day of July,
2017.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC 203614
ATTORNEY FOR PETITIONER
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CAGUAS PR 00726-0186
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MONEY ORDER RECEIPT - NON NEGOTIABLE

7/14/17

LOAD THIS DIRECTION, THIS SIDE UP

LOAD THIS DIRECTION, THIS SIDE UP

AGT 111377 LOC 000000 DT 071417 \$200.00 2HUNDREDDOLLARS AND NO CENTS

Payable to:
RETAIN THIS MONEY ORDER RECEIPT. IT MUST BE INCLUDED WITH ALL REFUND REQUESTS. BE AWARE OF THE FOLLOWING INFORMATION BELOW AND ON BACK. For your own records, it is recommended that you make a photocopy of this receipt. MONEY ORDER BEING PROVIDED TO THE RECIPIENT.
PURCHASE AGREEMENT: You the purchaser agree that Western Union Financial Services Inc. (WUFSI) need not stop payment on, or replace, or return a lost or stolen Money Order unless (1) you fill in the back of the Money Order at the time of purchase, and (2) you report the loss or theft to Western Union Financial Services Inc. in writing immediately, and (3) you provide WUFSI with the original Money Order receipt issued by Western Union Financial Services Inc., Englewood, Colorado. For customer service, call 1-800-553-4222.

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Caso Núm./Case No. 13-06917-ESL
Mes a Pagar/Month Due June 2017 2
Cantidad / Amount
Cheque Num./ Check No.
Fecha / Date

Caso Núm./Case No. 13-06917-ESL
Mes a Pagar/Month Due July 2017
Cantidad / Amount
Cheque Num./ Check No.
Fecha / Date